



**RAB Comments and HPHA Response**  
**Proposed 2019-2024 PHA Five-Year Plan Revisions**  
**Proposed 2019 – 2020 PHA Annual Plan Revisions**

1. **Proposed Revision:** Federal Public Housing Administration – Update policy on the implementation of security improvements, including the establishment of quiet times, utilize and require tenant ID cards, install video cameras and security features.

RAB comment: The RAB feels that it is inefficient to require ID cards to be updated yearly and proposed that ID cards be confiscated from tenants when they are evicted. The RAB feels that the ID card system is not being enforced, stating that ID cards are rarely checked.

HPHA Response: The HPHA is working to streamline the ID card process for better efficiency and implementation across all properties to increase safety and accountability.

2. **Proposed Revision:** Federal Public Housing Administration – Removing the suggested change to adopt rules regarding remaining members of assisted tenant families to allow only the original household members at the time of placement in federal public housing program to retain the unit and public housing assistance where other members of the family have left the unit; and to provide for the termination of the rental agreement/assistance or nonrenewal of the rental agreement once all household members are no longer in the household; and to provide an exception for families where the original parents in the household are survived by minors who were subsequently added to the household, until the minors reach a certain age (e.g., 21 years of age).

RAB comment: The RAB disagrees with removing this policy from the plan, and feels that this will allow individuals to circumvent the waitlist.

HPHA Response: The HPHA acknowledges the RAB's opinion on this policy and will continue to consult on this policy. The HPHA's goal is to avoid displacement of household members who are minors and provide enough time for those individuals who do not continue to qualify for housing to secure alternate housing.



3. **Proposed Revision:** Federal Public Housing Administration – Adopt a policy to allow adults, who have been removed from the lease for at least six months, back onto the lease.

RAB comment: Some members of the RAB do not support this proposed revision. These RAB members feel that stricter enforcement on who is allowed to return to the unit helps to break the cycle of public housing and prevents individuals from circumventing the waitlist. Other RAB members feel that the current policies could disincentivize household members from moving out and penalized those who try to make it on their own but encounter difficulties and are no longer able to return. A RAB member proposed limiting the amount of times any one individual could be removed and put back on the lease.

HPHA Response: The HPHA acknowledges the RAB's comments and agrees that there are pros and cons to implementing a proposed policy like this. HPHA will continue to analyze and discuss the policy.

4. **Proposed Revision:** Federal Public Housing Administration – Amend policy to state that when a tenant enters public housing by way of citizen sponsorship into the State of Hawaii, to state that when the tenant does not have another source of income, the income of the sponsor will be included when calculating the rent for the tenants.

RAB comment: The RAB feels that the sponsor should be held accountable until the sponsorship ends.

HPHA Response: The HPHA acknowledges the RAB comment and will continue to discuss this policy.

5. **Proposed Revision:** Housing Choice Voucher Administration – Amend the Homeownership requirements in the HCV Administration Plan to require applicants to be eligible for the Family Self Sufficiency (FSS) program prior to applying for the program.

RAB comment: The RAB supports the proposed revision.

HPHA Response: The HPHA appreciates the support of the RAB.

6. **Proposed Revision:** Housing Choice Voucher Administration – Amend Housing Choice Voucher policy when the family composition is reduced, to state that a voucher downsize will occur at the end of the lease or the next annual recertification, whichever comes first.



Hawaii Public Housing Authority  
PHA Annual and Five Year Plan  
Fiscal Year 2019 – 2020  
Fiscal Year 2019 – 2024

Attachment B

RAB comment: The RAB supports the proposed revision.

HPHA Response: The HPHA appreciates the support of the RAB.

7. **Proposed Revision:** Housing Choice Voucher Administration – Update the HCV minimum rent policy to institute a minimum rent of \$50

RAB comment: The RAB supports the proposed revision, stating that it will make the HCV program uniform with public housing.

HPHA Response: The HPHA appreciates the support of the RAB.

8. **Proposed Revision:** Housing Choice Voucher Administration – Create a hardship exemption policy in the HCV program.

RAB comment: The RAB supports the proposed revision, stating that there should be a hardship exemption policy whenever there is a minimum rent.

HPHA Response: The HPHA appreciates the support of the RAB.